

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

CORIZON, LLC,)
Plaintiff,)
v.) No. 3:20-cv-00892
PRISCILLA WAINWRIGHT, et al.,) Judge Richardson
Defendants.) Magistrate Judge Frensley

JOINT MOTION TO EXTEND CERTAIN DISCOVERY DEADLINES

Pursuant to Local Rule 6.01(a), Paragraph M of the Case Management Order (“CMO”), [Doc. 60], and the Agreed Order amending the CMO [Doc. 111], Plaintiff Corizon, LLC (“Corizon”); Defendants Priscilla Wainwright, Tony C. Parker, Michael F. Perry, Maggie Wilson, and John Does 1-10 (the “State Defendants”); Defendant Centurion of Tennessee, LLC (“Centurion”); and Defendant Wesley Landers jointly move the Court to amend the CMO and the Agreed Order to extend certain discovery deadlines.

Per the Agreed Order, the parties were to complete all written discovery and depose all fact witnesses on or before November 30, 2021. [Doc. 111]. The parties timely served written discovery on or about October 15, 2021. The parties subsequently scheduled a mediation for December 14, 2021. Given the potential for an agreed resolution, however potentially remote it may be, in the interest of judicial economy, all parties have agreed to mutual extensions for all responses to outstanding discovery requests to December 31, 2021. Therefore, the parties respectfully request that the Court extend the deadline to complete all written discovery to **December 31, 2021**, for the limited purpose of allowing the parties additional time to respond to the written discovery served on or about October 15, 2021. This extension shall not affect the

expired October 15, 2021 deadline to serve written discovery or the expired November 16, 2021 deadline for depositions of fact witnesses.

Per the Agreed Order, the parties must initiate all discovery disputes by December 15, 2021. [Doc. 111]. In light of the extension requested above, good cause exists for a corresponding extension of the deadline to bring discovery disputes to the attention of the Court. Therefore, the parties respectfully request that the Court extend the deadline to bring any discovery dispute to the attention of the Magistrate Judge to **January 14, 2022**.

Per the CMO, Plaintiff's expert disclosures are due December 16, 2021 and Defendants' expert disclosures are due February 1, 2022. In light of the December 14, 2021 mediation and the same potential for settlement, good cause exists for a corresponding extension of the expert disclosure deadlines. Therefore, the parties respectfully request that the Court extend Plaintiff's expert disclosure deadline to **December 31, 2021** and Defendants' expert disclosure deadline to **February 16, 2022**. The deadline for expert depositions remains March 1, 2022.

The parties otherwise request that all remaining deadlines set out in the CMO and the Agreed Order remain undisturbed and state that the requested extensions conform to the requirements of Local Rule 16.01(h)(1):

Type of Deadline	Original Deadline	New Deadline (<i>affected deadlines</i>)
Mediation Deadline	December 15, 2021	December 15, 2021
Written Discovery Responses	November 30, 2021	<u>December 31, 2021</u>
Plaintiff Expert Disclosures	December 16, 2021	<u>December 31, 2021</u>
Discovery Disputes	December 15, 2021	<u>January 14, 2022</u>
Defendant Expert Disclosures	February 1, 2022	<u>February 16, 2022</u>
Expert Depositions	March 1, 2022	March 1, 2022

Dispositive Motions	April 1, 2022	April 1, 2022
Trial Date	August 23, 2022	August 23, 2022

A proposed Agreed Order has been filed contemporaneously herewith.

Respectfully submitted,

s/ W. Travis Parham, by R. Mark Donnell, Jr.
with permission

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CERTIFICATE OF SERVICE

I certify that on November 29, 2021, the foregoing document was filed using the court's Electronic Case Filing system, which will serve notice of such filing on all counsel of record, as indicated below:

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